



**Environmental  
Protection Agency**

Ted Strickland, Governor  
Lee Fisher, Lt. Governor  
Chris Korfeski, Director

Re: Harrison Truck & Body, Inc.  
Hazardous Waste  
Wood County  
RTC/WL

August 31, 2010

Mr. Gary Harrison  
Harrison Truck & Body, Inc.  
11100 Wayne Road  
Wayne, Ohio 43466

Dear Mr. Harrison:

Thank you for your April 27, 2010, and May 5, 2010, responses to Ohio EPA's March 24, 2010, Notice of Violation letter (NOV). Joe LaMarche submitted these responses on your behalf. On April 27, 2010, Mr. LaMarche submitted a universal waste management plan for your fluorescent bulbs and analytical data for the sampling of your Zep parts washing filter indicating that this filter was hazardous for cadmium. On May 5, 2010, Mr. LaMarche submitted information stating that to date you have generated approximately one to two parts washing filters on a 12-14 month interval for changing these filters.

My review of this documentation reveals that Harrison Truck & Body, Inc. has adequately demonstrated abatement of the violations discovered during the March 3, 2010, inspection as listed below:

Violation	Date Violation Observed	Date Violation Abated
1. OAC Rule 3745-52-11 Waste Evaluation.	A.) March 3, 2010 B.) March 3, 2010	A.) April 27, 2010 B.) April 27, 2010

Ohio EPA, Division of Hazardous Waste Management is concerned about your prior management of your spent parts washing filter. Based on the analytical received on April 27, 2010, your spent parts washer filter is a hazardous waste for cadmium. Thus, it is possible that you may have discarded these spent filters as solid waste when in fact they could have been hazardous. However, it seems that at most you may have only discarded one to two of the spent filters over the course of two years. Likewise Mr. LaMarche stated via email on May 5, 2010, that you will place a satellite container with a removable lid next to the parts washer and label it "spent/used solvent filters" and manage and dispose of these as a hazardous waste in the future. This is an acceptable method of management of this waste.

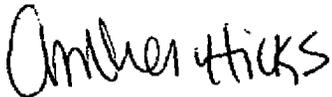
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As a conditionally exempt small quantity generator of hazardous waste, you do not have a time limit on how long you may store your waste prior to pick-up by a licensed hazardous waste hauler but only a quantity limit (no more than 220lbs of hazardous waste generated per month or up to 2200 lbs of hazardous waste on-site at any one time). Please ensure to not exceed either of these quantity limitations or you may become a small quantity generator of hazardous waste (many more regulatory requirements).

Please be advised that you did not properly evaluate the spent filters in the past. Furthermore, please note it is a serious violation of Ohio's hazardous waste laws to illegally dispose of a hazardous waste and could lead to possible escalated enforcement action. It is imperative that Harrison Truck & Body, Inc., takes seriously its responsibility to comply with Ohio's hazardous waste laws. I expect that you are equally concerned with the violations discussed in this letter and will take appropriate measures to ensure these failures do not recur. Specific attention must be taken to evaluate all wastes generated at your facility in accordance with OAC Rule 3745-52-11 and thus manage and dispose of such wastes accordingly. Your efforts to maintain compliance with Ohio's hazardous waste laws will be verified during a future inspection.

No response to this letter is necessary. If you should have any questions, please feel free to call me at (419) 373-3082.

Sincerely,



Amber M. Hicks  
Division of Hazardous Waste Management

//lr

pc: Colleen Weaver, DHWM, NWDO  
Cindy Lohrbach, DHWM, NWDO  
(DHWM, NWDO File: Harrison Truck & Body, Inc.)

ec: Amber Hicks, DHWM, NWDO

**NOTICE:**

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with all applicable regulations.